

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

In re IronNet, Inc. Securities Litigation

Case No. 1:22-cv-00449-RDA-JFA

CLASS ACTION

**STIPULATION AND PROPOSED ORDER GOVERNING
PLEADING AND BRIEFING SCHEDULE**

Lead Plaintiff James Shunk (“Lead Plaintiff”) and Defendants IronNet, Inc., Keith B. Alexander, William E. Welch, and James C. Gerber (collectively, “Defendants” and together with Lead Plaintiff, the “Parties”), by and through their respective counsel, hereby stipulate as follows:

WHEREAS, on April 22, 2022, the initial complaint in this action (“Complaint”) alleging violations of Sections 10(b) and 20(a) of the Securities and Exchange Act of 1934 (Dkt. No. 1) was filed;

WHEREAS, on July 15, 2022, the Court entered an order, pursuant to the Private Securities Litigation Reform Act of 1995, appointing James Shunk as Lead Plaintiff and approving his selection of Bernstein Liebhard LLP as Lead Counsel (Dkt. No. 41);

WHEREAS, on July 15, 2022, the Court further ordered counsel for Lead Plaintiff and Defendants to submit a proposed schedule for the filing of an amended complaint and Defendants’ responses thereto (Dkt. No. 41);

NOW, THEREFORE, the Parties hereby stipulate and agree, through their undersigned counsel, and subject to the approval of the Court, as follows:

1. Defendants are not required to respond to the Complaint;
2. Lead Plaintiff shall file an amended complaint on or before September 16, 2022;

3. Pursuant to Federal Rule of Civil Procedure 4(d), Defendants agree to waive service of the amended complaint; however, Defendants do not waive and expressly reserve all rights, claims, and defenses, including, but not limited to, all jurisdictional defenses, other than any objections to the sufficiency of service of the summons with respect to the amended complaint and the form of the summons with respect to the same;

4. Pursuant to Federal Rule of Civil Procedure 4(d)(3), Defendants' response to the amended complaint shall be due on or before November 15, 2022;

5. If Defendants move to dismiss the amended complaint, then Lead Plaintiff's opposition to such motion shall be due on or before January 17, 2023, and Defendants' reply shall be due on or before March 2, 2023.

Dated: July 23, 2022

Respectfully submitted,

THE KAPLAN LAW FIRM

/s/ Matthew B. Kaplan
Matthew B. Kaplan (VSB # 51027)
1100 N. Glebe Rd., Ste. 1010
Arlington, VA 22205
Tel: (703) 665-9529
mbkaplan@thekaplanlawfirm.com

Local Counsel for Lead Plaintiff

BERNSTEIN LIEBHARD LLP

Laurence J. Hasson
Joseph R. Seidman, Jr.
Jeffrey R. McEachern
10 East 40th Street
New York, NY 10016
Telephone: (212) 779-1414
Facsimile: (212) 779-3218
Email: lhasson@bernlieb.com
seidman@bernlieb.com
jmceachern@bernlieb.com

Lead Counsel for Lead Plaintiff

COOLEY LLP

/s/ Robert T. Cahill

Robert T. Cahill (VSB # 38562)
11951 Freedom Drive
Reston, VA 20190-5656
Telephone: (703) 456-8000
Facsimile: (703) 456-8100
Email: rcahill@cooley.com

Aric H. Wu (*pro hac vice*)
55 Hudson Yards
New York, NY 10001-2157
Telephone: (212) 479-6550
Facsimile: (212) 479-6275
Email: ahwu@cooley.com

Attorneys for Defendants

It is SO ORDERED.

Rossie D. Alston, Jr.
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2022, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

Dated: July 23, 2022

/s/ Matthew B. Kaplan

Matthew B. Kaplan (VSB # 51027)

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